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*Admitted *Pro Hac Vice*

*Attorneys for the Chapter 11
Debtors and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re
EASTERDAY RANCHES, INC., *et al.*
Debtors.¹

Chapter 11`

Lead Case No. 21-00141-11
Jointly Administered

**NOTICE OF HEARING ON
DEBTORS' FIRST OMNIBUS
OBJECTION TO CLAIMS OF
BENTON COUNTY TREASURER
(SATISFIED CLAIMS)**

¹ The Debtors along with their case numbers are as follows: Easterday Ranches, Inc., (21-00141) and Easterday Farms, a Washington general partnership (21-00176).

NOTICE OF HEARING ON DEBTORS'
FIRST OMNIBUS OBJECTION TO
CLAIMS – Page 1

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PARTIES RECEIVING THIS NOTICE SHOULD REVIEW EXHIBIT B TO THE OBJECTION TO DETERMINE IF THEIR CLAIM IS SUBJECT TO THE OBJECTION. PARTIES WHOSE CLAIMS ARE LISTED ON EXHIBIT B ATTACHED TO THE OBJECTION MAY HAVE SUBSTANTIVE RIGHTS AFFECTED BY THIS OBJECTION, INCLUDING HAVING THEIR CLAIMS DISALLOWED AND EXPUNGED. ANY PARTY WHO DISPUTES THE TREATMENT OF THEIR CLAIM IN ACCORDANCE WITH THE OBJECTION MUST FILE A RESPONSE TO THE OBJECTION IN ACCORDANCE WITH THE INSTRUCTIONS BELOW.

TO: THE CLERK OF THE BANKRUPTCY COURT
AND TO: UNITED STATES TRUSTEE
AND TO: BENTON COUNTY TREASURER AND PARTIES-IN-INTEREST
AND TO: THE HONORABLE WHITMAN L. HOLT

HEARING DATE: June 28, 2022
HEARING TIME: 10:30 a.m. (Pacific Time)
HEARING PLACE: Telephonically via conference call-in number:
(877) 402-9757, Access Code: 703-6041

PLEASE TAKE NOTICE that on May 26, 2022, Easterday Ranches, Inc. and Easterday Farms, the above-captioned debtors and debtors in possession (the “Debtors”), through their undersigned counsel, filed the *Debtors’ First Omnibus Objection to Claims of Benton County Treasurer (Satisfied Claims)* (the “Objection”) with the United States Bankruptcy Court for the Eastern District of Washington (the “Bankruptcy Court”). The Objection is on file with the Bankruptcy Court. Any party desiring information as to the details may request same from the Clerk of the Court or from the undersigned counsel. The Objection is also available, free of charge, on the Debtors’ creditor website at: <https://cases.creditorinfo.com/EasterdayRanches>.

Your claim may be eliminated. Through the Objection, the Debtors are seeking to have the claims of Benton County Treasurer listed on Exhibit B disallowed and expunged. You should read these papers carefully and discuss them with your attorney, if you have one.

PLEASE TAKE FURTHER NOTICE that, if you do not want the Bankruptcy Court to eliminate or change your claim, then on or before June 21, 2022 (the “Response Deadline”), you must file a written response to the Objection (a “Response”) with the United States Bankruptcy Court for the Eastern District of Washington, Room 304, 904

NOTICE OF HEARING ON DEBTORS’
FIRST OMNIBUS OBJECTION TO
CLAIMS – Page 1

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W. Riverside Avenue, Spokane, WA 99201. If you mail your Response to the Bankruptcy Court for filing, you must mail it early enough so that the Bankruptcy Court will **receive** it on or before the Response Deadline. At the same time, any party submitting a Response must serve a copy of its Response upon the undersigned counsel to the Debtors so as to be received on or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE that any Response must contain, at a minimum, the following:

- (a) a caption setting forth the name of the Bankruptcy Court, the name of the Debtors, the case number, and the title of the Objection to which the Response is directed;
- (b) the name of the claimant and his/her/its claim number;
- (c) the specific factual basis and supporting legal argument upon which the claimant will rely in opposing this Objection;
- (d) any supporting documentation, to the extent it is not included in the proof of claim previously filed with the Bankruptcy Court, upon which the party will rely in order to support the basis for and amounts asserted in the proof of claim; and
- (e) the name, address, telephone number, and email of the person(s) (which must be the claimant or the claimant's legal representative) with whom counsel for the Debtors should communicate with respect to the claim or the Objection and who possess authority to reconcile, settle, or otherwise resolve the objection to the disputed claim on behalf of the claimant.

PLEASE TAKE FURTHER NOTICE THAT A TELEPHONIC HEARING WITH RESPECT TO THE OBJECTION WILL BE HELD ON JUNE 28, 2022 AT 10:30 A.M. (PACIFIC TIME).

IF YOU FAIL TO RESPOND TO THE OBJECTION IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR OPPORTUNITY FOR A HEARING.

IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE BANKRUPTCY COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE OBJECTION TO YOUR CLAIM.

NOTICE OF HEARING ON DEBTORS'
FIRST OMNIBUS OBJECTION TO
CLAIMS – Page 2

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1 Dated: May 26, 2022

BUSH KORNFELD LLP

2 */s/ Thomas A. Buford, III*

3 THOMAS A. BUFORD, III (WSBA 52969)

4 BUSH KORNFELD LLP

5 RICHARD M. PACHULSKI (admitted *pro hac vice*)

6 JEFFREY W. DULBERG (admitted *pro hac vice*)

7 JASON H. ROSELL (admitted *pro hac vice*)

8 PACHULSKI STANG ZIEHL & JONES LLP

9 *Attorneys for Debtors and Debtors in Possession*

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28 NOTICE OF HEARING ON DEBTORS'
FIRST OMNIBUS OBJECTION TO
CLAIMS – Page 3

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HON. WHITMAN L. HOLT
HEARING DATE: June 28, 2022
HEARING TIME: 10:30 a.m.
RESPONSE DUE: June 21, 2022
LOCATION: Telephonic

RICHARD M. PACHULSKI (CA Bar #90073)*
JEFFREY W. DULBERG (CA Bar #181200)*
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Debtors and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re
EASTERDAY RANCHES, INC., *et al.*
Debtors.²

Chapter 11`
Lead Case No. 21-00141-11
Jointly Administered
**DEBTORS' FIRST OMNIBUS
OBJECTION TO CLAIMS OF
BENTON COUNTY TREASURER
(SATISFIED CLAIMS)**

Easterday Ranches, Inc. ("Ranches") and Easterday Farms, a Washington general partnership ("Farms"), debtors and debtors in possession (collectively, the "Debtors") in the above-captioned chapter 11 cases (collectively, the "Chapter 11 Cases"), by and

² The Debtors along with their case numbers are as follows: Easterday Ranches, Inc., (21-00141) and Easterday Farms, a Washington general partnership (21-00176).

DEBTORS' FIRST OMNIBUS
OBJECTION TO CLAIMS OF
BENTON COUNTY TREASURER
(SATISFIED CLAIMS) – Page 1

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through their undersigned counsel, hereby object (the “Objection”), pursuant to section 502 of Title 11 of the United States Code (the “Bankruptcy Code”) and Rules 3007 and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) to the claims of Benton County Treasurer (“Benton County”) identified on **Exhibit B** (the “Benton County Claims”) and seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”) disallowing and expunging the Benton County Claims listed on **Exhibit B**. In support of this Objection, the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

This court has jurisdiction over the Objection pursuant to 28 U.S.C. § 157 and 28 U.S.C. § 1334. This Objection is a core proceeding under 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

On February 1, 2021 (the “Ranches Petition Date”), Easterday Ranches, Inc. (“Ranches”) filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code before the United States Bankruptcy court for the Eastern District of Washington, Yakima Division (the “Bankruptcy Court”).

On February 8, 2021 (the “Farms Petition Date” together with the Ranches Petition Date, the “Petition Dates”), Easterday Farms (“Farms”) also filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code before the Bankruptcy Court.

The Debtors continue to operate and manage their business and affairs as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code and have substantially completed the wind down of their farming and ranching operations.

On February 16, 2021, the Office of the United States Trustee (the “U.S. Trustee”) appointed the following creditors to the Ranches Official Committee of

DEBTORS’ FIRST OMNIBUS
OBJECTION TO CLAIMS OF
BENTONCOUNTY TREASURER
(SATISFIED CLAIMS) – Page 2

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Unsecured Creditors, as amended [Docket Nos. 152, 154, and 155] (the “Ranches Committee”): (i) J.R. Simplot; (ii) Alto Nutrients; and (iii) Animal Health International.

On February 22, 2021, the U.S. Trustee appointed the following creditors to the Farms Official Committee of Unsecured Creditors, as amended [Docket Nos. 187, and 188] (the “Farms Committee”): (i) Labor Plus Solutions, Inc.; (ii) The McGregor Company; (iii) John Deere Financial; (iv) Dykman Electrical Inc.; (v) Two Rivers Terminal; and (vi) Frank Bushman.

Information about the Debtors’ historical business operations, capital structure, and the events leading up to the commencement of these Chapter 11 Cases is set forth in the *Declaration of T. Scott Avila in Support of First Day Motions* [Docket No. 93] (the “First Day Declaration”), which is incorporated herein by reference.

On February 12, 2021, the Bankruptcy Court entered an order [Docket No. 139] which, among other things, established May 28, 2021 (the “General Claims Bar Date”) as the deadline by which creditors, other than governmental units, must file a proof of claim with respect to both Debtors and August 9, 2021 (the “Governmental Unit Bar Date”) as the deadline by which governmental units must file a proof of claim with respect to both Debtors.

On April 9, 2021, the Debtors each filed their respective Statements of Financial Affairs and Schedules of Assets and Liabilities. *See* Docket Nos. 541, 542, 547.

On July 20, 2021, the Bankruptcy Court entered the *Order (A) Authorizing the Debtors to Acquire Certain Assets Owned by the Easterdays; (B) Authorizing the Sale of Property Free and Clear of Interests, Including Liens, Claims, Liabilities, and Encumbrances; (C) Granting the Buyer the Protections Afforded to a Good Faith Purchase; (D) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (E) Granting Related Relief* [Docket No. 927] (the “Sale Order”). The Sale Order approved, *inter alia*, the sale of substantially of the Debtors’

DEBTORS’ FIRST OMNIBUS
OBJECTION TO CLAIMS OF
BENTONCOUNTY TREASURER
(SATISFIED CLAIMS) – Page 3

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1 real property assets and personal property assets (other than rolling stock) located in
2 Benton County to Farmland Reserve Inc. Upon information and belief, at the closing
3 of the sale approved by the Sale Order, all outstanding tax obligations of the Debtors
4 owed to Benton County were paid.

5 **RELIEF REQUESTED**

6 By this Objection, the Debtors object to the Benton County Claims set forth on
7 **Exhibit B** attached hereto and, for the reasons described below, seek entry of the
8 Proposed Order, pursuant to section 502 of the Bankruptcy Code and Bankruptcy Rules
9 3007 and 9014, disallowing and expunging the Benton County Claims as set forth
10 below.

11 **THE BENTON COUNTY CLAIMS**

12 The Debtors and their professionals have examined the Benton County Claims
13 identified on **Exhibit B** annexed hereto, and object to such claims on the grounds that
14 the Benton County Claims were satisfied and paid in full pursuant to the terms of the
15 Sale Order.

16 Accordingly, to ensure the accuracy of the claims register and avoid an improper
17 duplicate payment on behalf of the Benton County Claims, the Debtors object to the
18 Benton County Claims identified on **Exhibit B** hereto and respectfully request entry of
19 the Proposed Order deeming each of the Benton County Claims as having been fully
20 satisfied, with no further amounts due and owing on account of such claims.

21 **SEPARATE CONTESTED MATTERS**

22 To the extent that a response is filed regarding any claim that is the subject of this
23 Objection and the Debtors are unable to resolve the response, each such claim, and the
24 objection to each such claim, asserted herein shall constitute a separate contested matter
25 as contemplated by Bankruptcy Rule 9014. Any order entered by the court regarding
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28 DEBTORS' FIRST OMNIBUS
OBJECTION TO CLAIMS OF
BENTONCOUNTY TREASURER
(SATISFIED CLAIMS) – Page 4

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any objection asserted in the Objection shall be deemed a separate order with respect to such claim.

RESPONSES TO THE OBJECTION

To contest an objection, a claimant must file and serve a written response to this Objection (a “Response”) so that it is received by the court and counsel for the Debtors no later than June 21, 2022.

Every Response to this Objection must contain, at a minimum, the following information: (i) a caption setting forth the name of the court, the name of the Debtors, the case number, and the title of the Objection to which the Response is directed; (ii) the name of the claimant and his/her/its claim number; (iii) the specific factual basis and supporting legal argument upon which the claimant will rely in opposing this Objection; (iv) any supporting documentation, to the extent it is not included in the proof of claim previously filed with the court, upon which the party will rely in order to support the basis for and amounts asserted in the proof of claim; and (v) the name, address, telephone number, and email of the person(s) (which must be the claimant or the claimant’s legal representative) with whom counsel for the Debtors should communicate with respect to the claim or the Objection and who possess authority to reconcile, settle, or otherwise resolve the objection to the disputed claim on behalf of the claimant.

The Debtors may, at their option, file and serve a reply to a claimant’s response, if any, no later than one day prior to the hearing to consider this Objection.

RESERVATION OF RIGHTS

The Debtors hereby reserve the right to amend, modify, and/or supplement this Objection. Further, to the extent the Benton County Claims are not disallowed and expunged by this Objection, the Debtors hereby reserve the right to file additional objections to the Benton County Claims listed on **Exhibit B** hereto.

DEBTORS’ FIRST OMNIBUS
OBJECTION TO CLAIMS OF
BENTONCOUNTY TREASURER
(SATISFIED CLAIMS) – Page 5

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CONCLUSION

WHEREFORE, the Debtors respectfully requests that the court enter the Proposed Order disallowing and expunging each of the Benton County Claims in their entirety.

Dated: May 26, 2022

BUSH KORNFELD LLP

/s/ Thomas A. Buford, III

THOMAS A. BUFORD, III (WSBA 52969)
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PACHULSKI STANG ZIEHL & JONES LLP
Attorneys for Debtors and Debtors in Possession

DEBTORS' FIRST OMNIBUS
OBJECTION TO CLAIMS OF
BENTONCOUNTY TREASURER
(SATISFIED CLAIMS) – Page 6

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EXHIBIT A
(Proposed Order)

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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re
EASTERDAY RANCHES, INC., *et al.*
Debtors.³

Chapter 11`

Lead Case No. 21-00141-11
Jointly Administered

**ORDER GRANTING DEBTORS'
FIRST OMNIBUS OBJECTION TO
CLAIMS OF BENTON COUNTY
TREASURER (SATISFIED CLAIMS)**

This matter came before the court on the *Debtors' First Omnibus Objection to Claims of Benton County Treasurer (Satisfied Claims)* (the "Objection"). Capitalized terms not defined in this Order shall have their meanings as set forth in the Objection. Appearances were as noted on the record.

This court has found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and has authority to enter a final order consistent with Article III of the United States Constitution; that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and that the notice of the Objection was appropriate under the circumstances and no other notice need be

³ The Debtors along with their case numbers are as follows: Easterday Ranches, Inc. (21-00141) and Easterday Farms, a Washington general partnership (21-00176).

ORDER GRANTING DEBTORS' FIRST
OMNIBUS OBJECTION TO CLAIMS OF
BENTON COUNTY TREASURER
(SATISFIED CLAIMS) – Page 1

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provided. Having reviewed the Objection and all documents filed in support of or opposition thereto, and having heard the statements of counsel at a hearing before this court (the "Hearing"); and this court having determined that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein,

IT IS HEREBY ORDERED THAT:

1. The Objection [Docket No. ●] is granted as set forth herein.
2. The Benton County Claims identified on Exhibit 1 annexed hereto are hereby deemed to have been fully satisfied and no further amounts are due and owing on account of the Satisfied Claims.
3. The objection to each claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.
4. This court shall retain jurisdiction over all affected parties with respect to any matters, claims, or rights arising from or related to the implementation and interpretation of this Order.

//End of Order//

Presented by:

BUSH KORNFELD LLP

/s/ DRAFT

THOMAS A. BUFORD, III (WSBA 52969)
BUSH KORNFELD LLP

ORDER GRANTING DEBTORS' FIRST
OMNIBUS OBJECTION TO CLAIMS OF
BENTON COUNTY TREASURER
(SATISFIED CLAIMS) – Page 2

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EXHIBIT B
BENTON COUNTY CLAIMS

Claim No.	Debtor	Date Claim Filed	Creditor Name	Claim Class	Total Claim Amount
128	Farms	5/27/2021	Benton County Treasurer	Secured	\$36.84
129	Farms	5/27/2021	Benton County Treasurer	Secured	\$130,971.18
131	Farms	5/27/2021	Benton County Treasurer	Secured	\$1,331.78
132	Farms	5/27/2021	Benton County Treasurer	Secured	\$1,256.70
133	Farms	5/27/2021	Benton County Treasurer	Secured	\$155.03
134	Farms	5/27/2021	Benton County Treasurer	Secured	\$43,005.99
67	Ranches	5/27/2021	Benton County Treasurer	Secured	\$776.07
68	Ranches	5/27/2021	Benton County Treasurer	Secured	\$2,156.18
69	Ranches	5/27/2021	Benton County Treasurer	Secured	\$1,243.60
70	Ranches	5/27/2021	Benton County Treasurer	Secured	\$125.35
71	Ranches	5/27/2021	Benton County Treasurer	Secured	\$190.33
72	Ranches	5/27/2021	Benton County Treasurer	Secured	\$3,464.54
73	Ranches	5/27/2021	Benton County Treasurer	Secured	\$3,183.00
74	Ranches	5/27/2021	Benton County Treasurer	Secured	\$5,071.70
75	Ranches	5/27/2021	Benton County Treasurer	Secured	\$3,614.00
76	Ranches	5/27/2021	Benton County Treasurer	Secured	\$3,388.11
77	Ranches	5/27/2021	Benton County Treasurer	Secured	\$3,823.34
78	Ranches	5/27/2021	Benton County Treasurer	Secured	\$11,712.66
79	Ranches	5/27/2021	Benton County Treasurer	Secured	\$4,249.66
80	Ranches	5/27/2021	Benton County Treasurer	Secured	\$4,190.71
81	Ranches	5/27/2021	Benton County Treasurer	Secured	\$302.40
82	Ranches	5/27/2021	Benton County Treasurer	Secured	\$3,705.03
83	Ranches	5/27/2021	Benton County Treasurer	Secured	\$45,556.98
84	Ranches	5/27/2021	Benton County Treasurer	Secured	\$811.50
85	Ranches	5/27/2021	Benton County Treasurer	Secured	\$199.63
88	Ranches	5/27/2021	Benton County Treasurer	Secured	\$522.55
89	Ranches	5/27/2021	Benton County Treasurer	Secured	\$116.73
90	Ranches	5/27/2021	Benton County Treasurer	Secured	\$21.18
91	Ranches	5/27/2021	Benton County Treasurer	Secured	\$1,363.18
92	Ranches	5/27/2021	Benton County Treasurer	Secured	\$1,363.18

Claim No.	Debtor	Date Claim Filed	Creditor Name	Claim Class	Total Claim Amount
93	Ranches	5/27/2021	Benton County Treasurer	Secured	\$1,156.59
94	Ranches	5/27/2021	Benton County Treasurer	Secured	\$1,156.59
95	Ranches	5/27/2021	Benton County Treasurer	Secured	\$1,156.59
96	Ranches	5/27/2021	Benton County Treasurer	Secured	\$1,054.03
97	Ranches	5/27/2021	Benton County Treasurer	Secured	\$541.80

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